



I 7/13/05

July 13, 2005

Mr. Michael Ribordy
On-Scene Coordinator
United States Environmental Protection Agency
Region 5
77 W. Jackson Street, SE-5J
Chicago, Illinois 60604

**RE: Next Media Operating, Inc.
Work Plan Implementation Update
114 Tower Hill Road
Gilberts, Illinois**

Dear Mr. Ribordy:

URS Corporation (URS) respectfully submits the following update regarding the delineation and remediation of lead-impacted soils at 114 Tower Hill Road (the Site) located in Gilberts, Illinois. URS performed the scope of work described below in accordance with the work plan (WP) approved by the United States Environmental Protection Agency (USEPA) dated December 2004. For your convenience, URS has included photographs taken during field activities and a sample location map, which are referenced below.

SUMMARY OF WORK PERFORMED

Site Preparation Activities

On June 1, 2005, URS mobilized to the Site to begin Site Preparation activities. As stated in the WP, these activities consisted of the following:

- Transfer of surficial battery casing fragments and immediately underlying soils to areas of the Site requiring treatment (see Photos #23, 26, and 27);
- Removal of trees, brush, and used tires (see Photos #19, 22, 24, and 25);
- Installation of a temporary gravel access road (see Photos #17 and 22) from the adjacent Village of Gilberts (Village) property;
- Surveying of the eastern property boundary; and
- Expansion of temporary construction fencing to encompass the entire remediation area (see Photo #22).

URS retained the services of R.W. Collins Co. (RWC), a USEPA-approved contractor, to perform these activities and the delineation sampling described herein. RWC completed the Site Preparation activities on June 2, 2005. During the Site Preparation activities,

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URS discussed the pending scope of work on multiple occasions with USEPA. Specifically, USEPA requested that URS not backfill any sample locations deemed “clean” during trenching and delineation activities in the event that USEPA would need to visually inspect these locations. URS indicated that no backfilling would occur; however, USEPA did not request an inspection of these sample locations while at the Site.

Delineation Sampling – (Phase I) North and West Walls

URS initially began delineating the extent of lead-impacted soils along the north and west walls of the existing excavation area. It should be noted that the delineation samples discussed below were collected directly from the excavator bucket, from an approximate depth of four feet below ground surface (bgs). The confirmatory samples discussed below, designated “CON”, were collected from the exterior sidewalls where bucket samples were previously collected. The depth of these samples varied between 1.5 and 2.5 feet bgs, based upon the proximity of the sample to the adjacent wetland area.

Delineation along the west wall focused initially upon the surficial battery casings located beneath a row of trees, which were removed during the aforementioned Site Preparation activities (see Photos #26 and 27). The casings extended to a depth of approximately 2-3 feet bgs, and approximately 28 feet west of the existing excavation. URS screened four delineation samples (WW-1 through WW-4) and four corresponding confirmatory samples (WW-1CON through WW-4CON) with a portable X-Ray Fluorescence (XRF) analyzer. A total of eight soil samples were collected from trenching along the western portion of the excavation (see Photos #28-30). As stated in the USEPA-approved WP, these samples were collected from areas, which did not exhibit evidence of battery casings, and from soils that did not exceed an XRF screening value of 300 mg/kg. Please refer to the attached figure for the approximate sample locations.

Delineation along the north excavation wall focused initially upon collecting two delineation samples (NW-1 and NW-2). URS collected a third delineation sample (NW-3) approximately 50 feet north of the northeast corner of the existing excavation (see Photos #34-36). URS consulted with USEPA to determine the location of NW-3, which was incorporated into the WP based upon analytical data obtained by USEPA on the Village property. URS collected a total of three delineation samples (NW-1 through NW-3) and three confirmatory samples (NW-1 CON, NW-2 CON, and NW CON-4) in delineating the north wall (see Photos #31-33). NW-1 CON and NW-2 CON corresponded to NW-1 and NW-2, whereas NW CON-4 was located approximately 24 feet north of the northeast corner of the existing excavation, where significantly higher lead levels were encountered during URS’ previous investigations. As explained above, these samples were screened with an XRF analyzer prior to submittal for laboratory analysis. URS completed its delineation sampling activities along the north and west excavation walls on June 3, 2005.

Summary of Analytical Results

URS submitted a total of 14 soil samples to STAT Analysis Corporation (STAT) laboratory, a USEPA-approved contractor, for analysis of total lead. With the exception of sample NW-2, none of the samples exceeded the USEPA-approved remediation standard of 400 mg/kg. Sample NW-2 exhibited a total lead level of 940 mg/kg; however, the corresponding confirmatory wall sample (NW-2CON) exhibited a total lead level of 370 mg/kg. Based upon these results, URS concluded that the majority of lead-impacted soils has been delineated along the north and west walls of the existing excavation.

It should be noted that although URS obtained a clean delineation and side wall sample at WW-1 and WW-1CON, URS observed debris, including battery casings, near the southwest portion of the excavation. URS could not perform a full delineation of the debris and lead-impacted soils within this area due to the adjacent wetland to the immediate south and the nearby construction fencing. Based upon the current logistical issues associated with accessing this area, URS recommends that this portion of the Site be further investigated and remediated in conjunction with the South Wall phase of the project.

Treatment and Removal – Phase I (North and West Walls)

URS treatment of the north and west excavation walls began on June 20, 2005 and was completed on June 22, 2005. RWC retained the services of Severson Environmental Services, Inc. (Severson), a USEPA-approved contractor, to perform treatment of delineated material along the north and west excavation walls. RWC and Severson treated the delineated material to an approximately depth of four (4) feet bgs. However, due to the topography of the Site, the overall depth of the excavation may vary.

Severson collected three confirmatory samples of the treated material, which were analyzed for Toxicity Characteristic Leaching Procedure (TCLP) for lead by Waste Stream Technology, Inc. On June 28, 2005, URS received a copy of Severson's confirmatory results indicating that none of the samples collected exceeded the regulatory threshold of 5.0 mg/kg for TCLP-lead.

Removal of treated material occurred on July 7-8, 2005. RWC removed a total of 54 truckloads of treated material from the Site, which was transported to the Orchard Hills Landfill, a USEPA-approved disposal facility, in Davis Junction, Illinois (see Photos #51-53). URS will determine the tonnage of material removed and confirm receipt of the material by the landfill upon receipt of load tickets and disposal manifests from RWC. In addition, URS collected a total of twelve (12) confirmatory floor samples and four (4) additional confirmatory side wall samples from the excavation. The samples were submitted to STAT on July 8, 2005. URS anticipates receipt of these results during the week of July 18, 2005.

The analytical results and XRF screening values obtained at the data points identified in the attached figure indicate that the total volume of lead-impacted soils located along the north and west excavation walls is approximately 685 cubic yards. This quantity is based upon a worst-case scenario in which the vertical extent of soils to be treated along the north and west excavation walls is four feet bgs. However, at least a portion of the soils located along the west wall extend down to an approximate depth of 2-3 feet bgs as these soils approach the adjacent wetland area. Based on the additional sample results, URS estimates that the total volume of soil to be treated and disposed of within the vicinity of the existing excavation to be approximately 1,000 cubic yards.

Delineation Sampling – Wetland Area

On June 16, 2005, URS collected soil and sediment samples as described in Phase IV (Wetland Area) of the WP. URS collected a total of six (6) samples, which were submitted to STAT for total lead analysis. Please note that the WP states that this phase was to begin after the completion of the south wall delineation (Phase III). However, given previous Site access issues, contractor availability, and the input of USEPA, URS opted to begin this phase prior to the completion of Phase III. URS also notified USEPA verbally of this potential change in schedule during field activities on June 1, 2005.

Samples G-1 and G-2 were collected west of the Village of Gilberts (Village) Public Works garage approximately 10-15 feet west of the property line. These samples did not exceed the USEPA-approved remediation standard of 400 mg/kg. Samples G-3 and G-4 were collected southwest of the Village garage, approximately 20 feet west of the property line. Samples G-3 and G-4 revealed elevated lead levels of 11,000 and 19,000 mg/kg for lead, respectively. URS also collected samples W-1 and W-2 within the wetland area, which were put on hold at STAT as the work plan did not require them to be analyzed unless battery casings were observed at the wetland boundary during the south wall delineation. If necessary, these samples may be analyzed at a later date.

PENDING ACTION

URS currently awaits the results of its confirmatory sampling as discussed above. As stated in the WP, partial backfilling of the existing excavation must occur prior to delineation and/or treatment of soils located along the eastern and southern excavation boundaries. URS requests that USEPA review and approve its confirmatory data, provided that none exceed the approved remediation standard of 400 mg/kg, prior to the commencement of backfilling activities.. Should URS' confirmatory data be approved by USEPA, URS anticipates that backfilling activities may begin during the week of July 25, 2005 or August 1, 2005. Upon completion of backfilling activities, URS anticipates that it will begin Phase II (East Wall) as described in the WP during the following week. Please note that RWC has already begun coordinating the stabilization of an adjacent electrical utility pole with ComEd. In addition, URS notified the Village on July 11, 2005 that the equipment and concrete pile currently stored east of the utility pole will need to be temporarily relocated in order for URS to execute this phase of the WP.

If you have any questions regarding the status of URS' completed or pending field activities, or analytical results to date, please contact me or Don Smith of my office at (312) 939-1000.

Sincerely,

URS

Don R. Smith
Assistant Project Manager



Christopher A. Albrecht
Project Manager

Attachments: Site Photos
 Sample Location Map

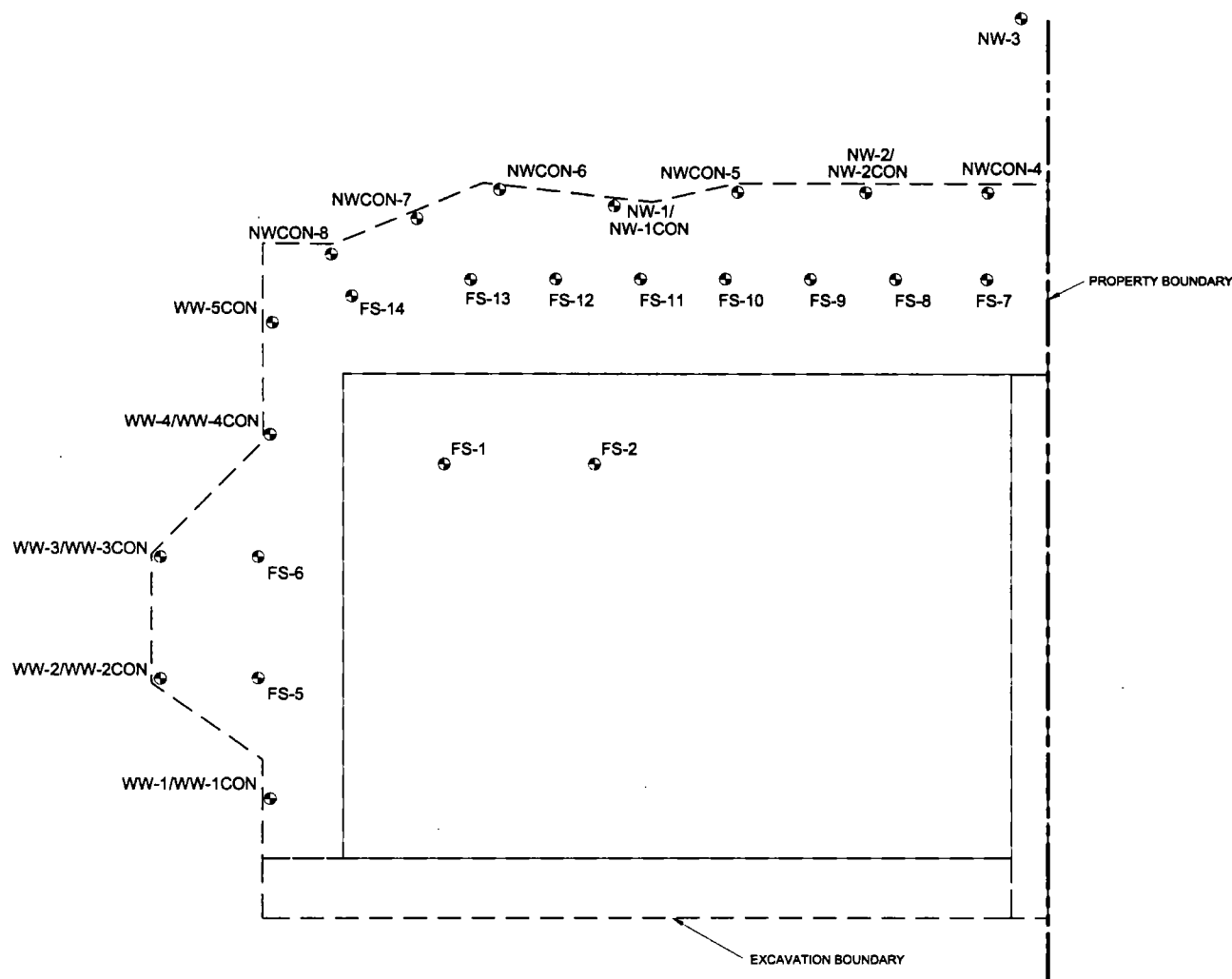
cc: Annemargaret Connolly, WGM
 Pam Pidge, URS



NORTH

0 15 30

SCALE IN FEET



NOTE: SAMPLES DESIGNATED 'CON' REFER TO CONFIRMATORY SIDEWALL SAMPLES

LEGEND

- CONFIRMATORY DELINEATION SAMPLE LOCATIONS

DATE:	JULY 11, 2005
DRAWN BY:	KH
CHK'D BY:	DS
SCALE:	1" = 30'

CONFIRMATORY / DELINEATION
SAMPLE LOCATION MAP
114 TOWER HILL ROAD
GILBERTS, ILLINOIS

URS
CHICAGO, ILLINOIS 60603

JOB NO.: 25365101

FIG. NO.: 1



Photo 1- View of USEPA remediation area on Village of Gilberts property north of salt shed (facing northwest).



Photo 2 – View of salt shed located on Village property (facing west).



Photo 3 – View of entrance to Site and adjacent USEPA remediation area located on Village property (facing west).



Photo 4 – View of adjacent USEPA remediation area located on Village of Gilberts property (facing southwest).



Photo 5 – View of Gilberts Public Works Garage followed by USEPA remediation area (facing south).



Photo 6 –USEPA remediation area on Village of Gilberts property north of salt shed (facing northwest).



Photo 7/8 – USEPA test pits located south of Public Works Garage along property boundary indicating subsurface lead impacts (facing west/south).



Photo 9/10 – USEPA excavation/remediation area along property boundary indicating presence of battery casings (facing west).



Photo 11 – Surficial battery casings located west of Public Works Garage on the Site (facing north).



Photo 12 – Rusted aboveground storage tank located west of Public Works Garage on the Site (facing north).



Photo 13 – Rusted drum located in wetland area west of Public Works Garage (facing north).



Photo 14 – View of damaged drainage piping on Village property along eastern boundary of the Site (facing west).



Photo 15 – USEPA remediation area on Village property located along eastern property boundary (facing north).



Photo 16 – View of Site prior to site preparation and delineation activities (facing south).



Photo 17 – View of Site during construction of temporary access road (facing west).



Photo 18 – Concrete debris unearthed during construction of temporary access road (facing west).



Photo 19 – Tires previously accumulated on Site during remediation activities (facing south).



Photo 20 – Saddle tank unearthed during construction of temporary access road (facing north).



Photo 21 – USEPA remediation area located north of salt shed on Village property (facing north).



Photo 22 – Relocated fencing and construction of access road, tree and brush removal (facing west).



Photo 23 – Surficial casings and six inches of underlying soil relocated along north wall of excavation (facing west).



Photo 24 – Grubbed area along western boundary of existing excavation (facing southwest).



Photo 25 – Grubbed area along western boundary of existing excavation (facing south).



Photo 26 – Surficial battery casings within grubbed area along western boundary of existing excavation (facing south).



Photo 27 – Surficial and subsurface battery casings located along western excavation boundary (facing south).



Photo 28 – View of test pits located along western boundary of existing excavation (facing south).



Photo 29 – Battery casings and debris unearthed during test trenching along western excavation boundary (facing south).



Photo 30 – Partial view of approximate extent of lead impacts along western excavation boundary (facing northeast).



Photo 31 – View of completed test pits/trenching along north wall of existing excavation (facing east).



Photo 32 – View of completed test pits/trenching along north wall of existing excavation (facing southeast).



Photo 33 - View of completed test pits/trenching along north wall of existing excavation (facing southwest).



Photo 34 – View of delineation sample NW-3 (facing east).



Photo 35 – View of delineation sample NW-3 (facing northwest).



Photo 36 – View of soil removed from delineation sample NW-3 (facing northeast).



Photo 37/38 – View of damaged property boundary stakes on Site (facing south).



Photo 38 – View of soil removed from excavation floor surrounding CON-10 and CON-11 for treatment (facing west).



Photo 39 – View of southern extent of west wall remediation (facing east).



Photo 40 – View of additional west wall material to be treated in conjunction with south wall (facing south).



Photo 41 –View of treated material along west wall and unearthed saddle tank (facing south).



Photo 42 – View of eastern extent of north wall remediation (facing south).



Photo 43 – View of soil removed from excavation floor surrounding CON-10 and CON-11 for treatment (facing southeast).



Photo 44 – View of treated material along north wall (facing east).



Photo 45 – View of sample location NWCON-4 (facing south).



Photo 46 – View of sample location NW-2CON (facing south).



Photo 47 – View of sample location NW-1CON (facing south).



Photo 48 –View of XRF screening location (facing south).



Photo 49 – View of north wall and excavation interior following treatment (facing northwest).



Photo 50 – View of west wall and excavation interior following treatment (facing west).



Photo 51 – View of excavation following removal of treated material along north excavation wall (facing southeast).



Photo 52 – View of excavation following removal of treated material along north excavation wall (facing west).



Photo 52 – View of excavation following removal of treated material along north and west excavation walls (facing west).